

**QUESTIONS FOR CYNTHIA J. KNOLL
APPOINTEE TO THE MICHIGAN TAX TRIBUNAL**

1. Why do you want to serve on the Tax Tribunal?
2. What expertise do you bring to the Tribunal?
3. What is your opinion of the Michigan Tax Tribunal as it currently exists?
4. What will be your approach in terms of how you handle cases that come before you?
5. In your estimation, what is the amount of time it should take for a Tribunal member to issue an opinion?
6. There currently is a request for a fee increase for the Tax Tribunal. Do you support this request? Why?
7. There is an idea being discussed to increase the number of attorneys who serve on the Tribunal. What do you think of this idea?
8. If you were ever asked by the Administration to slow down your operation in order to save the state from having to send out refunds, how would you respond?
9. If there was one thing that you could do to improve the Tax Tribunal, what would that be?

CYNTHIA J KNOLL, CPA
RESPONSES TO QUESTIONS FOR APPOINTEE TO THE MICHIGAN TAX TRIBUNAL
Submitted August 6, 2009

1. Why do you want to serve on the Tax Tribunal?

After spending virtually my entire professional career in public accounting, I found it was time to do something different. My technical skills were as sharp as ever yet I felt personally unfulfilled by the exhaustion of long hours, stress from increasing demands, and discouragement due to the sagging economy. I needed a career change. I have long thought of pursuing a law degree; believing a role in the judicial system would be extremely interesting and exciting. The Tribunal has provided me the opportunity to "try on" the profession. Serving on the Tribunal will also allow me to make an impact on this state. I would feel an incredible sense of pride and accomplishment to be part of a team working to provide quality service to Michigan citizens by the Michigan Tax Tribunal.

2. What expertise do you bring to the Tribunal?

As a practicing CPA for over 20 years, I have specialized exclusively in the technical area of state and local tax. In 1989, I attended an intensive, 3 week course developed and sponsored by Arthur Andersen. Instruction was conducted primarily by attorneys and the content focused on applicable US Constitutional issues as well as specific state statutes and case law. My tenure with Andersen involved consulting with clients on multi-state tax issues, ranging from fairly simple questions to extremely complex state tax projects and related business issues. Subsequent to the ultimate demise of that firm, I joined the Michigan CPA firm of Rehmann Robson. My responsibility as Director of State and Local Tax for the firm entailed consulting with clients on various Michigan tax issues including Single Business Tax, income tax, sales and use tax audits, etc. I also studied and analyzed the new MBT for the purpose of educating colleagues and clients on implementing the law. This practical expertise is quite unique; one that I believe will be of great contribution to the Tribunal.

3. What is your opinion of the Michigan Tax Tribunal as it currently exists?

Having no prior direct interaction with the Tribunal, my opinion was based on hearsay. After working at the Tribunal for 3 weeks, I have developed a preliminary opinion. For the most part, I believe the Tribunal members are very experienced, competent and committed to the mission of the Tribunal. The staff is hard working, conscientious and well trained. The continued decline in property values in Michigan, along with the recent enactment of a dramatically different business tax indicates that the number cases will continue to rise. The Tribunal must be prepared to respond to the volume with resources and tools. The recent addition of the Hearing Referee program for purposes of hearing and processing small claims appears to be well received and effective. However, the limited staff and antiquated technology will hinder any attempt at improving the efficiency of the Tribunal.

4. What will be your approach in terms of how you handle cases that come before you?

I will read all documents and exhibits submitted prehearing, listen to both the Petitioner and Respondent testimony, and ask questions as I deem necessary and appropriate to fully understand the facts and claims made. I will apply relevant statutory authority to the evidence and issue my opinions accordingly. I believe I am a strict constructionist in application of law yet I respect precedent. The facts of each and

every taxpayer must be reviewed in light of applicable standards and shall be given fair and equitable consideration.

5. In your estimation, what is the amount of time it should take for a Tribunal member to issue an opinion?

This question cannot be answered without significant assumptions being made. Each case is independent and unique, and the complexities vary widely. Some cases are based on disagreement of fact whereas others are based on interpretation of law. Although cases should be processed expeditiously, it is incumbent on each Tribunal member to exercise good professional judgment, investing the appropriate amount of time to come to a fair and rational conclusion.

6. The Chairman of the committee has requested a fee increase for the Tax Tribunal. Do you support this request? Why?

Yes, although I believe taxpayers have the right to be heard in a fair trial, they should be responsible for some of the cost. It is my understanding that the fees have never been increased and I do not feel that the fees as proposed are onerous. A fee might help avoid the filing of frivolous or otherwise weak cases. A taxpayer that is serious about an appeal will be willing to pay for it.

7. There is a proposal being discussed to increase the number of attorneys who serve on the Tribunal. What do you think of this idea compared to the current mix of professionals on the Tribunal?

The current members of the Tribunal are very different, with diverse backgrounds in public and private sectors. Although not an attorney, I believe the background I bring to the Tribunal is practical and applicable. My experience with non-property tax matters is unique to the Tribunal, as is the experience of the Assessor member. Whereas a legal education and professional background would certainly be helpful, I believe the variety of technical experts brings a greater depth and strength to the Tribunal.

8. If you were ever asked by the Administration to slow down your operation in order to save the state from having to send out refunds, how would you respond?

My responsibility is to adjudicate cases assigned to me. To that end, my professional ethics dictate that I perform in an efficient and competent manner. Any conclusions of fact and law that I make will not be influenced by the financial condition of the taxpayer nor the state.

9. If there was one thing that you could do to improve the Tax Tribunal, what would that be?

I would implement updated technology and procedures to improve the efficiency of document management, i.e., move toward a paperless environment through the use of an electronic file system.